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William Caton
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RECEIVED

APR 24 1996

**Re: WT Docket 96-6
Notice of Ex Parte Presentation**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Mr. Caton:

This morning, Danny E. Adams and Edward A. Yorkgitis, Jr. of Kelley Drye & Warren, and George M. Reed, Senior Director of Strategic Planning of DSC Communications Corporation ("DSC") met with Barbara S. Esbin, Special Counsel for Competition of the Commercial Wireless Division, and Lisa M. Warner and David Krech, staff attorneys in the Commercial Wireless Division.

Messrs. Reed, Adams, and Yorkgitis discussed matters addressed in DSC's comments in the above-captioned rulemaking and reiterated DSC's general support for the Commission's proposal to allow CMRS providers to use their spectrum to provide fixed wireless services, including wireless local loop.

A copy of the materials which DSC made available at the meeting are attached hereto.

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William F. Caton
April 24, 1996
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An original and one copy of this letter is being filed with the Secretary as required by Section 1.1206(a)(2) of the FCC's Rules.

Please contact the undersigned if you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ed Yorkgitis, Jr.", with a stylized flourish at the end.

Edward A. Yorkgitis, Jr.
Attorney for DSC Communications Corporation

Attachment

cc w/out attachment via first class mail:

Barbara S. Esbin
Lisa M. Warner
David Krech

DSC

COMMUNICATIONS

Summary of DSC Comments to FCC
Docket No. 96-6 NPRM re Flexible
Service Offerings in the CMRS

Contents

- ***FCC Proposal***
- ***Statement of Interest***
- ***DSC's Comments***
- ***Airspan System Description***
- ***Benefits of DSC's Airspan Technology***
- ***Airspan Deployments and Field Trials***
- ***Plan for Deployment in the United States***

DSC

FCC Proposal

FCC Docket No. 96-6

The Commission proposes to clarify/modify its rules to allow Commercial Mobile Radio Service (CMRS) providers to provide fixed wireless services (including wireless local loop (WLL)) within their spectrum assignments.

DSC

DSC's Statement of Interest

- **DSC Communications Corporation**
 - **Founded in 1976**
 - **Telecommunications equipment manufacturer providing switching, access, transmission, intelligent network, and network management products around the world**
 - **1995 revenues in excess of \$1.4 Billion**
- **Supplies Wireless Fixed Access product called Airspan which provides WLL services in the 1.3 - 2.7 GHz band**
- **Airspan can complement broadband PCS services in the United States**
- **Airspan provides the opportunity for efficient entry of facilities-based local exchange services**

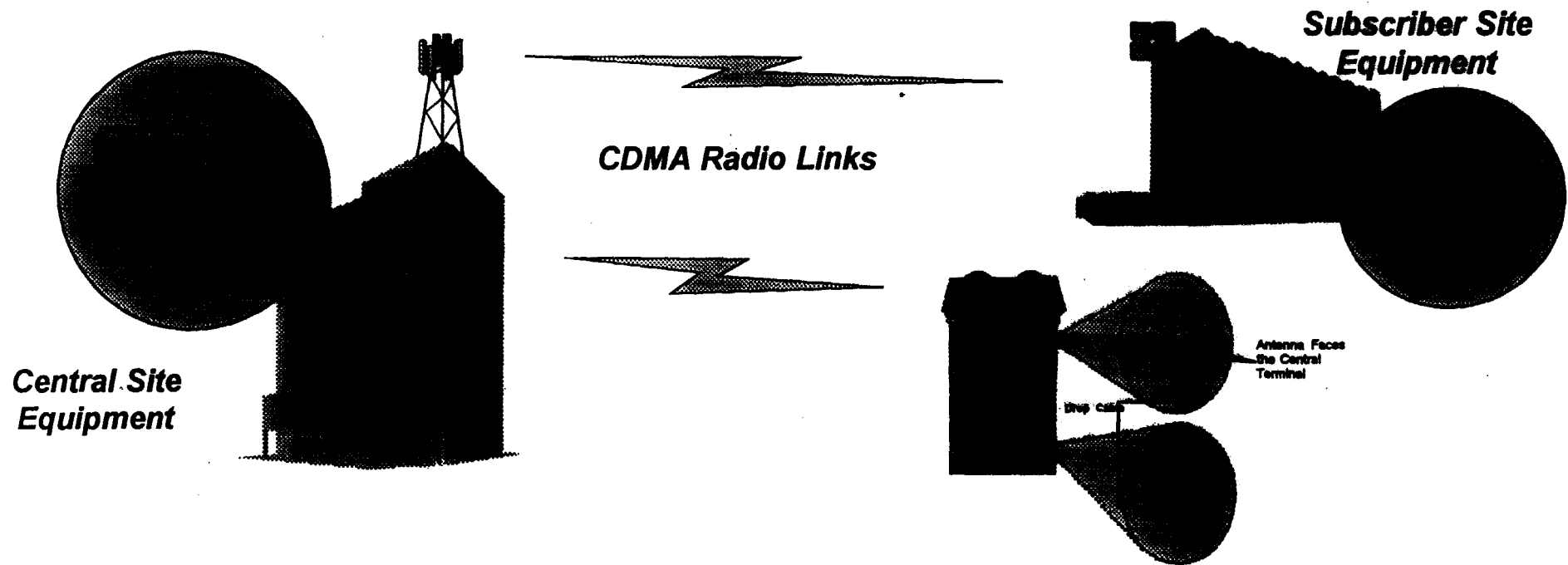
DSC

DSC's Comments

- **DSC believes the public interest would benefit if CMRS licensees are given the flexibility to offer fixed services including wireless local loop.**
- **Commission's proposal is a good first step in bringing WLL technology to the public.**
- **DSC believes the full promise of WLL systems will be achieved via the allocation of spectrum specifically for WLL systems.**
- **DSC requests that the FCC takes the necessary steps to make available spectrum in the 1.3 - 2.7 GHz band for fixed WLL.**

DSC

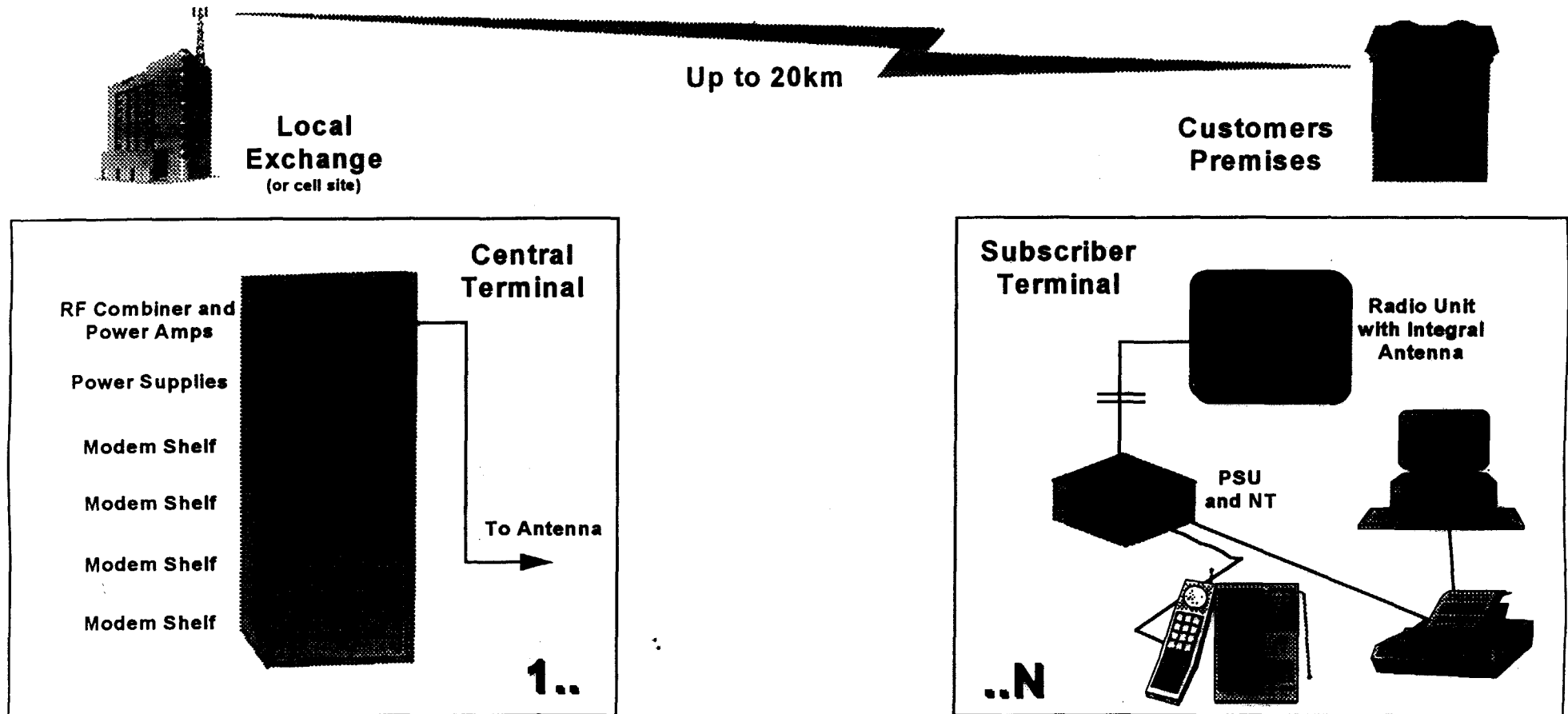
Airspan System Description



- A CDMA-based, High Capacity, Digital Radio Telephone system for Wireless Fixed Access.
- An alternative to "Copper in the Local Loop" to provide Telephony, Data, and Basic Rate ISDN services.
- Customers use Standard Telephones, Fax Machines, and Modems.
- Coverage is Wide Area and "Cellular-Like", Frequency Reuse $N = 1$ to 3.
- Meets Fixed Network Standards (i.e. User Bit Rate = 64kbit/s, Delay < 1ms, BER better than 1×10^{-7}).

DSC

Airspan System Components



DSC

Benefits of DSC's Airspan Product

- **Airspan designed and developed specifically for WLL applications; operation/evaluation in 15 countries**
- **Airspan provides:**
 - Wide-area coverage
 - Wireline network speech quality
 - Voiceband data and facsimile transparency
 - 64 kbps data channels
 - ISDN
- **Airspan accelerates the emergence of local competition by removing two key entry barriers: time and money**
 - Time reduction due to shortened duration for base station versus copper/fiber deployment
 - Cost reduction due to decreased capital intensity particularly in rural areas

DSC

Airspan Deployments and Field Trials

Airspan Wireless Fixed Access System

- **Current Trials and System Evaluations in the following countries:**

Argentina

Norway

Chile

Poland

China*

Russia*

Colombia*

South Africa

India

Sweden

Indonesia

United Kingdom

Jamaica

Venezuela

Lebanon

* Denotes Systems in Service

DSC

Plan for Deployment in the US

- **Wireless Fixed Access (WFA) serves as an adjunct to CMRS**
- **Demand requires allocation of spectrum for WFA**
 - **CMRS can not fulfill entire demand**
 - **Technology should be available to non-CMRS licensees who want to compete in the local exchange marketplace**
- **DSC plans to file Petition for Rulemaking in the near future**

DSC